

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

)	
JANE DOE,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:18-cv-614 (LOG/MSN)
)	
FAIRFAX COUNTY SCHOOL BOARD,)	
)	
Defendant.)	
)	

DEFENDANT FAIRFAX COUNTY SCHOOL BOARD'S PROPOSED WITNESS LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court's Orders of October 2, 2018 (Dkt. #30), and March 13, 2019 (Dkt. #119), Defendant Fairfax County School Board provides the following about the witnesses that it may present at trial other than solely for impeachment:

A. Witnesses Whom the School Board Expects to Call

1. Michelle Taylor
2. Jennifer Hogan
3. John Banbury
4. Jamie VanValkenburg
5. Alyson Calvello
6. Wally Baranyk
7. Jane Doe
8. John Doe
9. Jane Roe
10. Mary (“Molly”) Brady

11. Charles Grausz
12. Mohammed Nouristani
13. Marisa London
14. Donald Clark
15. Mary Ann Panarelli
16. Liza H. Gold, M.D.

B. Witnesses Whom the School Board May Call if the Need Arises

17. Hillary Huffman
18. Hannah Moore-Chalko
19. Laura Kelly
20. Kathleen Sefchick
21. Darryl Estess
22. Michael Vary
23. Katherine Byrd
24. Lauren Husman
25. William Tiller
26. Grant Trouton
27. Jamie Lane
28. Jack Smith
29. Jack Smith's mother
30. Any witness identified in Plaintiff's Rule 26(a)(3)(A) disclosures to whom Defendant does not object or to whom Defendant's objection is overruled.

C. **Designation of Those Witnesses Whose Testimony the School Board Expects to Present by Deposition**

The School Board does not currently expect to present any witnesses by deposition, but it reserves the right to present witnesses through deposition should any witness become unavailable to testify in person at trial.

Respectfully submitted,

FAIRFAX COUNTY SCHOOL BOARD

By: /s/
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Counsel for Defendant Fairfax County School Board

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of April, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to counsel of record for all Parties.

 /s/
Sona Rewari (VSB No. 47327)